



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

JAN 20 2015

Mr. Matthew Stuckey
Chief
Permits Branch
Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

Dear Mr. Stuckey:

The U.S. Environmental Protection Agency has reviewed the draft prevention of significant deterioration (PSD) and part 70 permit renewal, permit numbers 147-33607-00041 and 147-29949-00041, respectively, for AK Steel Corporation, Rockport Works, located in Rockport, Indiana. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

- 1.) The PSD permit establishes best available control technology (BACT) requirements for three hydrogen batch annealing furnaces that were constructed without obtaining prior construction approval and revises previously-issued particulate matter smaller than 10 microns in diameter (PM₁₀) BACT emission limits upwards for several other emission units at the facility. An air quality analysis, an air quality impact analysis, or an additional impact analysis is not included within the permit's technical support document and its appendices. These analyses are required by 40 C.F.R. § 51.166 and 326 IAC 2-2.

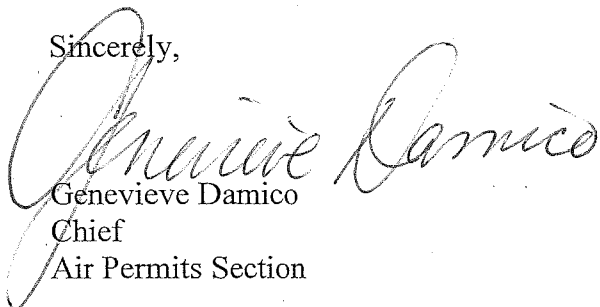
During a call with the Indiana Department of Environmental Management (IDEM) on January 16, 2015, Michael Langman, of my staff, discussed the apparent absence of these analyses within the technical support document with the permit writer and concluded that the analyses have been conducted to evaluate the impact of the new and revised BACT limits for all pollutants and are included within the permit record. It is also our understanding that IDEM determined that the modeling results for all pollutants involved in this PSD action are protective of the national ambient air quality standards, do not exceed the available PSD increment, and generally comply with all PSD requirements. Please ensure that this information is included in the permit record and verify that the

new and revised BACT limits comply with all applicable PSD requirements.

- 2.) Condition E.3.2 lists the specific applicable requirements of 40 C.F.R. 63 Subpart ZZZZ. However, there may be several potentially applicable requirements that were not included and at least one requirement that may not be applicable.
- a. Condition E.3.2(d) lists 40 C.F.R. § 63.6600 as an applicable requirement. 40 C.F.R. § 63.6600 contains requirements that apply to stationary reciprocating internal combustion engines (RICE) located at a major source of hazardous air pollutants (HAPs). However, pages 8-9 of the technical support document states that the unrestricted potential to emit of single and total HAPs is less than 10 and 25 tons per year, respectively, making this source an area source of HAPs. Please determine whether 40 C.F.R. § 63.6600 is an applicable requirement and update the permit, if necessary.
 - b. 40 C.F.R. §§ 63.6625 and 63.6640 contain requirements that are applicable to emergency stationary RICE located at an area source of HAP emissions. However, these requirements are not identified within condition E.3.2 of the permit. Please determine whether 40 C.F.R. §§ 63.6625 and 63.6640 are applicable requirements. If they are applicable requirements, then please incorporate the specific applicable requirements into the permit.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Michael Langman, of my staff, at (312) 886-6867.

Sincerely,



Genevieve Damico
Chief
Air Permits Section